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DEPARTMENT OF
WATER RESOURCES

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re CSRBA

Case No. 49576

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)

A. Subcases: See Attachment A

**STANDARD FORM 2
RESPONSE TO OBJECTION**

B. NAME AND ADDRESS OF PERSON RESPONDING

Name: John Baldwin
Address: PMB 29, Box 10001
Saipan, MP 96950
(Formerly 504 Progress, Spokane Valley, WA 99037—See Claim 95-13826)
Daytime Phone: (670) 322-2222

Name & Address of Attorneys:

Christopher H. Meyer
Michael P. Lawrence
Jeffrey W. Bower
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Telephone: (208) 388-1200

**C. NAME AND ADDRESS OF PERSON WHO FILED THE OBJECTION TO WHICH
YOU ARE RESPONDING**

Name: State of Idaho
Address: 700 W. Jefferson, Room 210
PO Box 83720
Boise, ID 83720-0010

D. I am responding to the Objections to the following elements or general provision.*

1. ☒ **Name and Address**
2. ☒ **Source**
3. ☒ **Quantity**
4. ☒ **Priority Date**
5. ☒ **Point of Diversion**
6. ☒ **Instream Flow Beginning and Ending Point**
7. ☒ **Purpose(s) of Use**
8. ☒ **Period of Year**
9. ☒ **Place of Use**
10. ☐ **General Provision**
11. ☒ **Recommendation:**

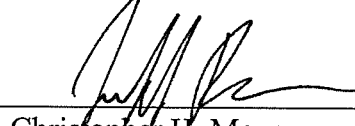
☒ This water right should not exist.

☐ This water right was not recommended, but should be recommended with the elements described above.

*The Respondent is responding to each element objected to by the State of Idaho for each claim listed in Attachment A.

DATED this 26th day of November, 2014.

GIVENS BURSLEY LLP



Christopher H. Meyer

Michael P. Lawrence

Jeffrey W. Bower

Attorneys for Respondents

E.

CERTIFICATE OF MAILING

I certify that on November 26, 2014, I mailed the original and one copy of this Response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Coeur d'Alene-Spokane River Basin Adjudication
253 Third Avenue North
PO Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant of the water right at the following address:

Name: See Attachment A
Address: See Attachment A

3. One copy to the party who filed the Objection at the following address:

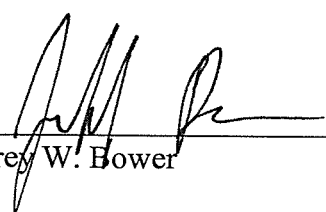
Name: State of Idaho
Address: 700 W. Jefferson, Room 210
PO Box 83720
Boise, ID 83720-0010

4. Copies to:

IDWR Document Depository
PO Box 83720
Boise, ID 83720-0098

United States Department of Justice
Environment & Nat'l Resources Div
550 W Fort Street, MSC 033
Boise, ID 83724

Chief, Natural Resources Division
Office of Attorney General
PO Box 83720
Boise, ID 83720-0010



Jeffrey W. Bower

ATTACHMENT A

The Respondent named in Item B of the attached Standard Form 2 Response to Objection (“SF2”) responds to the Objections filed by the State of Idaho in the following subcases. The Claimants’ names and addresses for service (SF2 Item E.2) also are listed.

	Subcase No.	Claimant’s Name	Claimant’s Address
1.	95-16663	Avista Corporation	1411 East Mission Spokane, WA 99220-3727
2.	95-16664	c/o William J. Schroeder, Esq. Paine Hamblen LLP (Attorneys for Avista Corporation)	717 West Sprague Ave. #1200 Spokane, WA 99201-3505
3.	91-7624	United States of America, on behalf of the	550 W. Fort Street MSC 033
4.	91-7636	U.S.D.A. Forest Service	Boise, ID 83724
5.	91-7729		
6.	92-10890	c/o Bruce D. Bernard, Esq.	999 18 th Street, Ste 945 N Tower
7.	92-10891	Environmental & Natural Resources Div.	Denver, CO 80202
8.	93-7433	U.S. Department of Justice	
9.	94-8621	c/o David L. Negri, Esq.	800 Park Blvd. Ste 600
10.	94-9133	Environmental & Natural Resources Div.	Boise, ID 83712-9903
11.	95-16527	U.S. Department of Justice	
12.	91-7755	United States of America, as trustee on	911 N.E. 11th Ave
13.	91-7756	behalf of the Coeur d’Alene Tribe of the	Portland, OR 97232
14.	91-7757	Coeur d’Alene Indian Reservation acting	
15.	91-7758	through the Northwest Regional Director,	
16.	91-7759	Department of the Interior, Bureau of	
17.	91-7760	Indian Affairs	
18.	91-7761	c/o Vanessa Boyd Willard	550 W. Fort Street, MSC 0330
19.	91-7762	United States Department of Justice	Boise, ID 83724
20.	91-7763	Environment & Natural Resources Div.	
21.	91-7764	Indian Resources Section	
22.	91-7765	(Attorneys for the United States of	
23.	91-7766	America)	
24.	91-7767		
25.	91-7768		
26.	91-7769		
27.	91-7770		
28.	91-7771		
29.	91-7772		
30.	91-7773		
31.	91-7774		
32.	91-7775		
33.	91-7776		
34.	91-7777		
35.	91-7778		
36.	91-7779		

	Subcase No.	Claimant's Name	Claimant's Address
37.	91-7780	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
38.	91-7781		
39.	91-7782		
40.	91-7783		
41.	91-7784		
42.	91-7785		
43.	91-7786		
44.	91-7787		
45.	91-7788		
46.	91-7789		
47.	92-10906		
48.	92-10907		
49.	92-10908		
50.	92-10909		
51.	92-10910		
52.	92-10911		
53.	92-10912		
54.	92-10913		
55.	92-10914		
56.	92-10915		
57.	92-10916		
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62.	92-10921		
63.	92-10922		
64.	93-7462		
65.	93-7463		
66.	93-7464		
67.	93-7465		
68.	93-7466		
69.	93-7467		
70.	93-7468		
71.	93-7469		
72.	93-7470		
73.	93-7471		
74.	93-7472		
75.	93-7473		
76.	93-7474		
77.	93-7475		
78.	93-7476		
79.	93-7477		
80.	93-7478		
81.	93-7479		

	Subcase No.	Claimant's Name	Claimant's Address
82.	93-7480	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
83.	93-7481		
84.	93-7482		
85.	93-7483		
86.	93-7484		
87.	93-7485		
88.	93-7486		
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100.	93-7498		
101.	93-7499		
102.	93-7500		
103.	93-7501		
104.	93-7502		
105.	93-7503		
106.	93-7504		
107.	93-7505		
108.	93-7506		
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111.	93-7509		
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123.	93-7521		
124.	93-7522		
125.	93-7523		
126.	93-7524		

	Subcase No.	Claimant's Name	Claimant's Address
127.	93-7525	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
128.	93-7526		
129.	93-7527		
130.	93-7528		
131.	93-7529		
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167.	93-7565		
168.	93-7566		
169.	93-7567		
170.	93-7568		
171.	93-7569		

	Subcase No.	Claimant's Name	Claimant's Address
172.	93-7570	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
173.	93-7571		
174.	93-7572		
175.	93-7573		
176.	93-7574		
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201.	93-7599		
202.	93-7600		
203.	93-7601		
204.	93-7602		
205.	93-7603		
206.	93-7604		
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210.	93-7608		
211.	93-7609		
212.	93-7610		
213.	93-7611		
214.	93-7612		
215.	93-7613		
216.	93-7614		

	Subcase No.	Claimant's Name	Claimant's Address
217.	93-7615	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
218.	93-7616		
219.	93-7617		
220.	93-7618		
221.	93-7619		
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223.	93-7621		
224.	93-7622		
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243.	93-7641		
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250.	93-7648		
251.	93-7649		
252.	93-7650		
253.	93-7651		
254.	93-7652		
255.	94-9244		
256.	94-9245		
257.	94-9246		
258.	94-9247		
259.	94-9248		
260.	94-9249		
261.	94-9250		

	Subcase No.	Claimant's Name	Claimant's Address
262.	94-9251	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
263.	94-9252		
264.	94-9253		
265.	94-9254		
266.	94-9255		
267.	94-9256		
268.	94-9257		
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296.	95-16669		
297.	95-16670		
298.	95-16671		
299.	95-16672		
300.	95-16673		
301.	95-16674		
302.	95-16675		
303.	95-16676		
304.	95-16677		
305.	95-16678		
306.	95-16679		

	Subcase No.	Claimant's Name	Claimant's Address
307.	95-16680	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
308.	95-16681		
309.	95-16682		
310.	95-16683		
311.	95-16684		
312.	95-16686		
313.	95-16687		
314.	95-16688		
315.	95-16689		
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340.	95-16716		
341.	95-16717		
342.	95-16718		
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346.	95-16722		
347.	95-16723		
348.	95-16724		
349.	95-16725		
350.	95-16726		
351.	95-16727		

	Subcase No.	Claimant's Name	Claimant's Address
352.	95-16728	United States of America, as trustee on	
353.	95-16729	behalf of the Coeur d'Alene Tribe of the	
354.	95-16730	Coeur d'Alene Indian Reservation acting	
355.	95-16731	through the Northwest Regional Director,	
356.	95-16734	Department of the Interior, Bureau of	
357.	95-16735	Indian Affairs, <i>continued</i>	
358.	95-16736		
359.	95-16737		
360.	95-16738		
361.	95-16739		
362.	95-16740		
363.	95-16741		
364.	95-16742		